

REMARKS

Affirmation is hereby made of the election of Group I without traverse. The remaining claims are being retained pending filing of a divisional application therefore.

The objection to the drawings is overcome by the amendment to the specification.

The objection to the Abstract of the Disclosure is respectfully traversed. The abstract of the disclosure is exactly what it is stated to be and is not an abstract of the claimed invention as will be apparent from a reading of the appropriate M.P.E.P. section. The present Abstract of the Disclosure is believed to be complete and accurate.

The title has been changed in the manner suggested by the Examiner.

The claims have been amended to overcome the rejection under 35 U.S.C. 112, second paragraph.

Claim 1, 3 and 4 have been amended. Claims 1 to 8 remain active in this application and claim 9 to 21 are withdrawn from consideration.

Claims 1 to 7 were rejected under 35 U.S.C. 102(b) as being anticipated by Bahnck et al. The rejection is respectfully traversed both as to the claims as originally filed as well as the claims amended.

Claim 1 requires, among other steps, the step of providing a substrate tray having depressions therein with a substrate in each depression, each depression having a hole. No such step is taught or suggested by Bahnck et al. either alone or in the combination as claimed.

Claim 1 further requires the step of providing and raising a plate with a plurality of protrusions through the tray, with each protrusion going through a different hole and

lifting and maintaining level or leveling the substrate in the corresponding depression while lifting the substrate concurrently with the other of the plurality of protrusions. No such step is taught or suggested by Bahnck et al. either alone or in the combination as claimed.

Claim 1 still further requires the step of providing and then lowering the lifting device having vacuum pads onto the tray. No such step is taught or suggested by Bahnck et al. in the combination as claimed.

Claim 1 even further requires the step of stopping the lifting device when the vacuum pads from the lifting device comes into contact with the substrates. No such step is taught or suggested by Bahnck et al. in the combination as claimed.

Claim 1 still further requires the step of applying a vacuum at the vacuum pads to temporarily attach the substrates to the vacuum pads. No such step is taught or suggested by Bahnck et al. in the combination as claimed.

Claims 2 to 7 depend from claim 1 and therefore define patentably over Bahnck et al. for at least the reasons presented above with reference to claim 1.

In addition, claim 2 further limits claim 1 by requiring that the protrusions on the plate be of sufficient height to lift the substrates up off the bottom of the tray. No such step is taught or suggested by Bahnck et al. either alone or in the combination as claimed.

Claim 3 further limits claim 1 by requiring that the protrusions on the plate be of sufficient height to lift the substrates up off the bottom of the tray and over the depressions in which they lie. No such step is taught or suggested by Bahnck et al. either alone or in the combination as claimed.

Claim 4 further limits claim 1 by requiring that the holes in the tray be sufficiently sized to permit the protrusions to come through the bottom of the tray.

Claim 5 further limits claim 4 by requiring that the holes in the tray be small enough to prevent the substrates from falling through. No such step is taught or suggested by Bahnck et al. in the combination as claimed.

Claim 6 further limits claim 1 by requiring that the method further include the step of raising the lifting device out of the tray after applying the vacuum. No such step is taught or suggested by Bahnck et al. either alone or in the combination as claimed.

Claim 7 further limits claim 1 by requiring that the protrusions be arranged in a two-dimensional array on the plate. No such step is taught or suggested by Bahnck et al. in the combination as claimed.

Claims 1 to 8 were rejected under 35 U.S.C. 103(a) as being unpatentable over Canella (U.S. 6,135,291) in view of Bahnck et al. The rejection is respectfully traversed.

The arguments applied above with reference to the rejection in view of Bahnck et al. applies as well to this rejection. Not only does Bahnck et al. fail to overcome the deficiencies in Canella and vice versa, but, in addition, there is no showing of any teaching or suggestion to combine these references even were they in combination to show or suggest that which is claimed, which they do not.

Claim 8 depends from claim 1 and therefore defines patentably over the applied references for at least the reasons presented above with reference to claim 1.

In addition, claim 8 further limits claim 1 by requiring that the protrusions be arranged in a linear array on a strip and a plurality of strips be joined to form the plate. No such step is taught or suggested by Bahnck et al. in the combination as claimed.

In view of the above remarks, favorable reconsideration and allowance are respectfully requested.

Respectfully submitted,



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